

**Johnson, Jere**

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**Sent:** Wednesday, May 15, 2013 4:59 PM  
**To:** Johnson, Jere  
**Subject:** Fw: Carson River Mercury Superfund Site

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 ----- Forwarded by Jere Johnson/R9/USEPA/US on 05/15/2013 04:58 PM -----

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 Subject: Carson River Mercury Superfund Site

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Hi Glen,

Robin Cobbey asked me to contact you regarding the SAP in Gold Canyon. Comstock Mining has an environmental firm doing some grid sampling of lower Gold Canyon for mercury, lead and arsenic. We did not have the opportunity to have independent experts (you?) really look at this plan but it seems a little deficient in practical terms. We have a large amount of anecdotal information about mercury in American Flat, and Gold Creek drainage. Spot sampling may be a good way to get the overall geochemical data but it seems lacking in adequately detecting pools of elemental Hg sitting at the bottom of the drainage or in puddles under the soil. I don't think they are using cold vapor atomic absorption sensors that might detect surface vapor off-gassing outside of their grid pattern, and it doesn't look like they are using other types of detectors to find sub-surface pooling of Hg. outside of their study areas, particularly, Gold Creek drainage. Could you recommend a strategy for us in relation to these testing protocols ?

We have asked EPA to require CMI to have a high volume air testing system in place before they do further soil disturbance, we worry that Hg may have been dispersed throughout Gold Canyon by a reckless disregard of the old mill tailing piles. This has, likely resulted in fugitive dust, contaminated with toxic materials being distributed throughout Gold Canyon and American Flat. EPA is currently investigating CMI under a CERCLA 104e inquiry which we hope will lead to more rational management practices and serious penalties against CMI for environmental crimes. The more testing of the soil, water and air the more secure we will be that we are being protected. I know how busy you are, but, would love to have you, John Hadder, Paul and I get together again over coffee!

Daan